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13 || Co-Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

1 Pursuant to Civil Local Rule 7-12, the parties, lead plaintiff KBC Asset Management NV
2 (“KBC” or “Lead Plaintiff”) and defendants LeapFrog Enterprises, Inc. (“LeapFrog” or the
3 “Company”), John Barbour and Raymond L. Arthur (collectively, “Defendants”), by and through
4 their undersigned counsel of record, submit the following stipulation and proposed order:

5 WHEREAS, on May 1, 2015, the Court held a hearing on motions to appoint Lead Plaintiff
6 and Lead Counsel and motion to consolidate cases. Dkt. No. 41;

7 WHEREAS, on May 5, 2015, the Court issued a written order granting KBC’s motion for
8 appointment as Lead Plaintiff and approved its selection of Motley Rice LLC (“Motley Rice”) and
9 Robbins Geller Rudman & Dowd LLP (“Robbins Geller”) as Co-Lead Counsel. Dkt. No. 43. The
10 Court also ordered the consolidation of *Grayson v. LeapFrog*, Case No. 3:15-cv-00453 and *Farias v.*
11 *LeapFrog*, Case No. 3:15-cv-00478 with *Newett v. LeapFrog*, Case No. 3:15-cv-00347. *Id.*;

12 WHEREAS, during the May 1, 2015 hearing, the Court ordered that a Consolidated
13 Complaint shall be filed by June 24, 2015, and that Defendants be afforded approximately five
14 weeks to respond to said complaint. The Court also scheduled the hearing on Defendants’
15 anticipated motion to dismiss and a case management conference (“CMC”) for September 24, 2015.
16 Dkt. No. 41;

17 WHEREAS, the parties have met and conferred and agreed given the parties’ schedule and
18 the complexity of this securities action, that approximately 30 days should be afforded to oppose any
19 motion to dismiss and 30 days to be afforded to any reply. Consequently, the parties respectfully
20 request that the hearing date and CMC previously scheduled for September 24, 2015 be rescheduled
21 to October 8, 2015 at 1:30 p.m., or a date convenient for the Court thereafter;

22 NOW THEREFORE, the parties hereby agree and stipulate to the following deadlines:

- 23 1. Lead Plaintiff shall file a consolidated complaint no later than June 24, 2015;
- 24 2. Defendants’ response to the amended complaint shall be filed on or before July 24,
25 2015;
- 26 3. Lead Plaintiff’s opposition to Defendants’ response shall be filed on or before August
27 25, 2015;
- 28 4. Defendants’ reply shall be filed on or before September 22, 2015; and

1 5. The hearing on Defendants' anticipated motion to dismiss and CMC shall be moved
2 from September 24, 2015 to October 8, 2015 at 1:30 p.m.

3 | DATED: May 21, 2015

ROBBINS GELLER RUDMAN
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17 | DATED: May 21, 2015

MORRISON & FOERSTER
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Attorneys for Defendants

1 I, Willow E. Radcliffe, am the ECF User whose ID and password are being used to file this
2 Stipulation and [Proposed] Scheduling Order. In compliance with Civil Local Rule 5-1(i)(3), I
3 hereby attest that Jordan Eth has concurred in this filing.

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CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2015, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 21, 2015.

s/ Willow E. Radcliffe
WILLOW E. RADCLIFFE

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Mailing Information for a Case 3:15-cv-00347-EMC In Re: LeapFrog Enterprise, Inc. Securities Litigation

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)